

Customer No.: 31561  
Docket No.: 10932-US-PA  
Application No.: 10/605,807

### REMARKS

This is a full and timely response to the outstanding Office Action mailed June 8, 2006. Claims 1-4 are pending and remained unchanged, as originally filed. Reconsideration and allowance of the application and presently pending claims 1-16 are respectfully requested.

#### Claim Rejections Under 35 U.S.C. 103(a)

The Office Action rejected claims 1-4 under 35 U.S.C. 103(a) as being unpatentable over Applicant's Admitted Prior Art (hereinafter AAPA) in view of Osame (7,002,545).

In response to the rejections thereto, Applicants hereby otherwise traverse the rejections. As such, Applicants submits that claims 1-4 are novel and unobvious over AAPA and Osame, or any of the other cited references, taken alone or in combination, and should be allowed.

With respect to claim 1, as originally filed, recites in part:

A display unit of an active-matrix organic light emitting display, comprising:

...

wherein said second transistor is a P-type transistor having a threshold voltage, and an absolute value of said threshold voltage of said second transistor is between 2V to 5V.

Applicants submit that such a display unit is neither taught, suggested, nor disclosed by AAPA, Osame, or any of the other cited reference, taken alone or in combination.

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As admitted by the Examiner, AAPA is silent as an absolute value of said threshold voltage of said second transistor is between 2V and 5V. The Examiner then cites Osame as a second reference to modify AAPA.

Applicants agree with what is asserted by the Examiner "that it is conventional for a P-type transistor to have an absolute value of the threshold voltage to be between 2V to 5V", as described in Osame. However, as set forth in MPEP §2143.01(a) and case law recited thereby, it has been held that "to rely on a reference under 35 U.S.C. 103, it must be analogous prior art".

While Osame concerns most about a shift register and method of driving the same, it is in a different field of the present invention as set forth in claims 1-4, and AAPA either, which concern about active-matrix organic light emitting display. Applicants further submit that the shift register of Osame and the display unit as set forth in claims 1-4 come up with different problems, and therefore P-type transistors employed in AAPA or the present invention addresses different object from Osame. As disclosed in paragraph [0008], a difficulty AAPA confronted is "the electrons and holes of the P-type LTPS-TFT are affected by the high Vgd to impact the Si-H bond, which causes the drain current supplied to the organic light emitting diode 330 to attenuate seriously after a period of time ... the brightness of the organic light emitting diode 330 will decrease after that period of time". On the contrary, Osame faces "the problem such as difficulties in operating at high frequency, noises in power supply lines, and a large area for placement" (Column 7, lines

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60-62). Therefore, Osame is not "reasonably pertinent to the particular problem with which the inventor was concerned" as required by the case law cited in MPEP §2141.01(a).

Furthermore, although Osame mentioned that a P-type transistor might to have an absolute value of the threshold voltage smaller than 3.5V, it gives no suggestion or motivation to modify a display unit as disclosed in AAPA addressing difficulties AAPA confronted. Since the P-type transistor of Osame is employed for solving different problems from the present invention, the present invention as set forth in claims 1-4 is submitted to be unobvious over AAPA and Osame (*Lindermann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F. 2d 1452, 221 USPQ 481 (Fed. Cir. 1984)).

Moreover, even though the Examiner had given a motivation to modify AAPA with Osame's P-type transistor as that "this will reduce the problems of difficulties in operating at high frequency, noise in power supply lines and a large area for placement", this "motivation" leads AAPA away from the present invention in fact. Applicants respectfully suggest the Examiner to pay attention on Osame's description that is "if the absolute value of the threshold voltage of the p-channel TFT 501a is smaller than 3.5V, the p-channel TFT 501a is undesiredably turned ON to make its source-drain conductive" (Column 6, lines 20-23; Empahsis added). Therefore, what can be taught to one of ordinary skill in the art hereby is a p-channel type transistor having an absolute value of the threshold voltage smaller than 3.5V produces undesirable result. In other words, Osame, if any, teaches away from the modification proposed by the Examiner to replay the transistor of AAPA with undesired p-channel transistor of Osame.

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For at least the foregoing reasons, the present invention, as set forth in claim 1 is submitted to be novel and unobvious over AAPA, Osame, or any of the other cited references, taken alone or in combination. As such, claim 1 and its dependent claims 2-3 are patentable over AAPA, Osame, and should be allowed.

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**CONCLUSION**

For at least the foregoing reasons, it is believed that the pending claims 1-4 are in proper condition for allowance and an action to such effect is earnestly solicited. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is invited to call the undersigned.

Date : Dec. 5, 2006

Respectfully submitted,

  
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